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Philip L. Verveer

July 18, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Thomas Sugrue, Esq.
Federal Communications Commission
Chief, Wireless Telecommunications Bureau
445 12th Street, S.W.
Washington, DC 20554

Re: Cingular Wireless, Inc.'s Request for Waiver of the E911 Phase II Location Technology Implementation Rules, CC Docket No. 94-102

Dear Mr. Sugrue:

TruePosition, Inc. ("TruePosition") files this letter in connection with Cingular Wireless, Inc.'s ("Cingular") July 6, 2001 petition for waiver of the E911 Phase II Location Technology Implementation rules.

TruePosition believes it would be helpful to clarify certain discrepancies involving TruePosition's technology set forth in Cingular's petition in advance of the comments called for by the Commission's Public Notice[1] and the resolution of Cingular's request for confidential treatment of certain attachments to its petition.[2] In light of the Commission's ongoing "evaluation of the current state of readiness of E911 location technologies,"[3] it is important that the Commission and interested parties understand that the test characterized in the petition:

- was conducted more than two years ago;

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1 Public Notice, "WTB Seeks Comment on Wireless E911 Phase II Waiver Request Filed by Cingular Wireless, LLC," DA 01-1628 (rel. July 11, 2001).

2 Order in CC Docket 94-102, DA 01-1712 (Chief, Policy Div., WTB, rel. July 17, 2001).

3 Id. ¶ 4.

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- was conducted over the course of only two one-half day sessions;
- was an AMPS ALI system.

It is more important that the Commission understand that TruePosition has made substantial improvements in its technology in the intervening twenty-six months, as evidenced, among other things, by the results TruePosition is achieving in a test of its TDMA technology today.

But even as to the minimal Houston AMPS test, we have not seen and thus cannot address Cingular's conclusions.[4]

As Cingular's petition indicated, it conducted a test of a TruePosition installation in Greater Harris County (Houston), Texas. This was an AMPS ALI system.

TruePosition installed its first generation AMPS technology in approximately 70 cell sites in Greater Harris County. It conducted extensive tests by reference to approximately 625 pre-established test points. TruePosition's results from its tests indicated accuracy of 80 meters at the 67th percentile and 280 meters at the 95th percentile. Greater Harris County Emergency Network conducted independent tests of the system's accuracy in March 1999. We believe that its results were consistent with those recorded by TruePosition.

The only BellSouth test conducted in connection with the Greater Harris County installation was very limited. It was done over the course of one-half day sessions on two consecutive days in May, 1999. As noted, TruePosition was not given BellSouth's test results.

As the Commission is aware, TruePosition submitted a letter in this docket on May 30, 2001 in connection with a closely similar waiver request submitted by AT&T Wireless. The May 30 letter described both relevant circumstances surrounding a TDMA test in Redmond, Washington and the progress that TruePosition had made since then in improving its TDMA location capabilities. As TruePosition indicated, its subsequent TDMA testing has produced very strong accuracy results meeting the FCC requirements.

One basis for this conclusion is TruePosition's ongoing experience with a TDMA test market in which TruePosition initiated test activity approximately three years ago. The system consists of 19 cell sites. TruePosition has installed its technology in 16 of the available sites. Installation of TruePosition technology in two of the three remaining sites would further improve

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[4] The only specific statements in the Cingular petition are premised upon AT&T Wireless' report of its Redmond, Washington beta trial of TruePosition's TDMA system. As TruePosition has noted, it would be incorrect to attempt to derive location policy based upon the AT&T Wireless description both because it is an incomplete account of the Redmond trial and because TruePosition's TDMA technology has progressed substantially since the trial was conducted. See TruePosition letter to Thomas Sugrue, May 30, 2001.

accuracy performance. TruePosition is willing and available to conduct joint tests of its TDMA technology and would be pleased to work with Cingular in this test market.

The most recent accuracy tests, measured against fixed test points in the test market, concluded this month and produced results that meet the FCC's requirements. The TDMA system located calls with an accuracy of 100 meters at the 67th percentile and 190 meters at the 95th percentile.

As it reported in its May 30 letter, TruePosition has made numerous hardware and software upgrades, advancing the system from version 1.0 during the Houston AMPS trial to version 5.0 available today and used in the TDMA test market. These improvements derive, among other things, from the addition of a capability to process locations using the voice/traffic channel as well as the control channel.

Please contact us if we can provide you with any additional information regarding the TruePosition location technology.

Sincerely,

Philip L. Verveer
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